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JUDGE: CHAPTER:

Hon. Marc L. Barreca

Chapter 7

HEARING DATE:

January 4, 2013

HEARING TIME: 9:30 a.m. **HEARING SITE:**

700 Stewart St., #7106

Seattle, WA 98101

RESPONSE DATE: December 28, 2012

UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

ADAM GROSSMAN,

Debtor.

Case No. 10-19817

DECLARATION OF DENICE MOEWES IN SUPPORT OF SECOND INTERIM APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES OF WOOD & JONES, P.S., ATTORNEY FOR TRUSTEE

DENICE MOEWES declares under penalty of perjury of the laws of the State of Washington as follows:

I am over the age of 21 and am competent to make this declaration.

We represent Ronald G. Brown, the Chapter 7 Trustee in the above-referenced matter.

Attached hereto are true and correct copies of the bills of Wood & Jones, P.S. from the period of December, 2011 through November 30, 2012.

Signed and dated this 13th day of December, 2012 at Seattle, Washington.

/s/ Denice E. Moewes Denice E. Moewes

DECLARATION OF MOEWES IN SUPPORT OF SECOND INTERIM APPLICATION FOR COMPENSATION OF WOOD & JONES, P.S., ATTORNEY FOR THE TRUSTEE Page 1 of 1

Wood & Jones, P.S 303 N. 67th Street Seattle, WA 98103 (206) 623-4382

EXHIBIT"1"

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

December 31, 2011

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

71469

			Hours	Amount
12/1/2011	DEM	Review emails from Karma and investigate Berkeley Financial. Email to Karma regarding deed of trust against Kahn house. (.7). Review all emails between Adam and Kahn forwarded by Karma. Email to Tess to search certain entities.(.9)	1.60	520.00M/S
12/2/2011	DEM	prepare stipulation and order re: recording void as to Opie Lyman. Revise and email to Hugh McCullough	0.80	260.00 ATC
	DEM	Preparation of Demand letter to Malaier relating to Tsai Law Group. Finalize	0.60	195.0015₩/
12/5/2011	TMK	Research re: Deed of Trust	3.10	387.50 MISC
	DEM	Exchange numerous emails with paralegal regarding Kahn (.9). Determine categories for fees. Prepare notice, order, declaration of Moewes and begin draft of first interim fee application.	5.40	1,755.00/FQ
12/6/2011	DEM	Continue work on fee application.	1.40	455.00 (FA
12/7/2011	DEM	Discussion re: defaults with paralegal. Discussion re: her call with Kerith Lisa. Email to Kerith Lisa.	0.40	130.00 ATM
12/8/2011	DEM	Exchange emails with Ron regarding potential settlement counter offer.	0.20	65.0054
12/13/2011	DEM	Phone call with Riordan re: Kerith Lisa stipulation.	0.20	65.00 ATM
	EJW	Review and revise first interim fee app.	0.20	70.001F4
	DEM	Break services into categories. Finish fee app, revise all documents and file.	5.50	1,787.50
12/14/2011	DEM	Review all for litigation guarantees and prepare motion, order and declaration for default against Keywest Financial, finalize and file. Prepare default against Irene Miller in draft. Prepare default against 773	4.20	1,365.004Try

			Hours	Amount
		Metro Way Family Trust. Discuss order quieting title with Wood. Exchange emails with Reynolds' attorney (.1)		
12/14/2011	DEM	Continue to work on fee application	2.30	747.5017
12/15/2011	DEM	Preparation of motion for default of 1670 Strauss Family Trust, order and declaration. Discuss with Wood. Revise several times. File. Prepare draft motion quieting title in 1679 Strauss Property in Trustee. Continue work on motion to default Miller. Review motion to abandon Terrington Davies.	4.30	1,397.50M ATS
12/20/2011	DEM	Review stipulation changes from McCullough, email back to him with changes. Prepare stip and order for Kerith Lisa and LeBlanc. Revise and send out.	2.90	942.50/m
12/23/2011	DEM	Pretrial	1.00	325.00 (4)
12/30/2011	DEM	Review notice of Chapter 7 filing for Keywest, pull up Georgia ECF and review docket. Discuss with paralegal.	0.40	130.00 AP
	DEM	Review objection from Ron. Review claims register. Email to Ron and confirm hearing for Friday.	0.60	195.00 DM
	For pr	rofessional services rendered	35.10	\$10,792.50
	Addition	onal Charges :		
9/23/2011 11/22/2011 12/6/2011 12/9/2011 12/31/2011	LA Su ABC L Northe	of America - Bank Documentation Fee re: Terrington Davies Capital Managen operior Court Legal Services - File search and copies Deed of Trust, Recording # 20110713 ern California Title Insurance - Litigation Guarantee aw Electronic Research - December		52.88 4.75 35.48 471.00 983.26
	Total	additional charges		\$1,547.37
	Total a	amount of this bill	-	\$12,339.87
	Previo	ous balance		\$86,502.33
	Balan	ce due		\$98,842.20

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

January 31, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

71533

			Hours	Amount
1/3/2012	DEM	Conference with Wood regarding response. Check docket in Georgia in relation to Keywest Chapter 7. Preparation of agreed order and send to Ron and Courshon	0.80	272.00 DMA
1/4/2012	DEM	Revise Reynolds stipulation and order and send to Attorney Bell.	0.40	136.00ATS
	DEM	Exchange emails with Hugh McCullough regarding Lyman stipulation (.1). check GA ECF to see if Keywest filed schedules (.1). Exchange emails with Courshon and Brown regarding agreed order, finalize file and call to Raimey (.3). Begin preparation of response to motion for order of abandonment of Terrington Davies, LLC. (.3) Email to Nate Riordan re: status of Kerith Lisa stipulation (.1). Email to Stephen Lelblanc re: status of him signing stipulation (.1).; Phone call with Wells re: settlement (.1)	1.10	374.00 ATC
1/5/2012	TMK	TFC with trustee's office in Atlanta GA regarding the KeyWest Financial bankruptcy case; TFC with clerk's office regarding same; email copy of amended complaint and other documents to GA trustee's office.	0.30	37.50 KWB
	DEM	Continue to work on response to motion to abandon Terrington Davies. Research on what percentage interest in TD debtor owns. Revise motion. Call with Jeffrey Bernstein. Email to Steve, Dellas's attorney. Conference with paralegal re: her call with BR Court in Georgia and with Trustee. Discuss what documents to send to Trustee.	5.10	1,734.00 DMA
	DEM	File signed stipulation and order avoiding Reynolds DOT	0.10	34.00ATS
1/6/2012	DEM	Exchange emails with Steve Porter regarding Dellas.	0.10	34.00DMA
1/9/2012	DEM	Phone call with Karma Zieke re: status of bankruptcy case.	0.40	136.00 MISC
1/12/2012	EJW	Review debtor's motion to intervene in adversary; Conference with Moewes	0.30	108.00 DMI

			Hours	Amount
1/12/2012	EJW	Review and revise Trustee's Response to Debtor's Motion for Abandonment of Terrington Davies, LLC>	0.10	36.00MA
	DEM	Check Georgia docket. Finalize response to motion to compel abandonment of TD. Preparation of Declaration of Moewes and exhibits thereto (.9). Discuss motion to intervene with Wood (.3)	1.20	408.00 DMA
1/17/2012	DEM	Prepare motion for default, order findings of fact conclusions of Law and declaration, review and revise. Review latest settlement offer. Review email from Steve Porter containing Adams latest gibberish. Meet with paralegal re: exhibits for my declaration. Email to Wells regarding continual claim that TF assets are in estate.	6.80	2,312.00 DMA
1/23/2012	DEM	Research on Stockbroker issue.	2.10	714.00 088
1/25/2012	DEM	Preparation of motion to compel turnover, and then perhaps comply with court order as facts are unveiled in preparation of motion. Email draft to Wood for his input.	3.80	1,292.00 ATS
1/26/2012	DEM	Work on default of 1379 Strauss Lane Family Trust.	1.80	612.00 ATS
1/27/2012	DEM	Revise motion and default order re: 1679 Strauss Lane Family Trust to include Keywest.	0.60	204.00 ATS
1/28/2012	DEM	Revise findings of fact, conclusions of law and default judgment to comport to other revisions in relation to 1679 Strauss Lane Property and email to Ed for his review.	0.50	170.00ATS
	DEM	Revise findings of fact, conclusions of law and default judgment to comport to other revisions in relation to 1679 Strauss Lane Property and email to Ed for his review.	0.50	170.00 ATS
1/30/2012	DEM	Legal research on whether a loan in a chapter 11, post-petition, constitutes property of the estate. Two revisions to Tsai Motion (2.1). Phone call with Shilla Clement. Email to her counsel (.5)	2.60	884.0075A)
1/31/2012	DEM	Substantial revision to Tsai Motion, exchange emails with Wood in relation thereto, prepare draft order and revise and prepare exhibits and draft declaration of Moewes. Phone call with Wells re: investor issue	2.60	884.00 T5A
	For pr	ofessional services rendered	31.20	\$10,551.50
	Additio	onal Charges:		
1/19/2012 1/24/2012		a County Recorder aw Electronic Research - January		66.00 1,004.19
	Total a	additional charges		\$1,070.19
	Total a	amount of this bill		\$11,621.69

RON BROWN, TRUSTEE	GROSSMAN, ADAM 92369	Page 3
		Amount
Previous balance		\$98,842.20
Accounts receivable trans	sactions	
1/10/2012 Payment - Thank you		(\$32,501.55)
Total payments and adjust	stments	(\$32,501.55)
Balance due		\$77,962.34

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

February 29, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

71599

		_	Hours	Amount
2/1/2012	DEM	Final review and revision of motion to compel turnover and declaration, finalize and file.	1.30	442.00TSM
2/2/2012	DEM	Exchange emails with Emily Jarvis re: hearing tomorrow. Phone call with attorney from Crocker office regarding order of default against Keywest.	0.40	136.00 DMF
2/3/2012	DEM	Pretrial on Keywest adversary proceeding. Attend hearing on motion to compel abandonment of Terrington Davies.	2.20	748.00DMA
	DEM	Finalize motion, declaration, exhibits, order of default and judgment as to 1679 Strauss Lane Property and file.	0.70	238.00ATS
2/6/2012	EJW	Review and revise default papers for 20710 Glennview Drive property.	0.50	180.00 ATC
	DEM	Prepare draft motion, order, and judgment against Defendants Miller, 20710 Glennview Drive Family Trust and Keywest. Search for information on Irene Miller and her husband in order to get military declarations.	4.40	1,496.00ATC
2/7/2012	DEM	Review and revisions to Grosmman motion and order defaulting Miller, 20710 Glennview Drive Family Trust and Keywest Financial. Finalize and file all documents	2.60	884.00 ATZ
	DEM	Review motion to intervene and impose stay. Review docket to see if anyone has moved for relief from stay. Review declaration of mailing to determine whom was served with motion since it was filed in adversary proceeding instead of main case.	0.50	170.00 DMI
2/8/2012	DEM	Discussion with Wood re: response to motion to intervene - may be moot in light of defaults being filed.	0.20	68.00 DMI
	DEM	Review email from Emily about order, and file order.	0.10	34.00 DMA

			Hours	Amount
2/8/2012	DEM	Begin preparation of default motion re: Metro Way. Need to amend complaint does not appear Metro Way Trust named as defendant. (.6). Research Evergreen Regional Home Mortgage Services in both Washington and California corporations department. No such entity, research on service. Discuss with Wood. Begin motion for default re: Montcrest and discuss with Wood, not certain whether it is property of the estate. Email to Corcker and Zeike. Call with Zeike. Preparation of response to motion to intervene and motion for injunction (1.3)	3.20	1,088.00 ÅTM
2/9/2012	DEM	Review motion to reimpose stay requirements. Revise response to motion for injunction and motion to intervene. Begin response to stockbroker motion. Substantial investigation on various legal issues, conversion, stockbrokers, etc.	4.90	1,666.00 DGB
2/10/2012	DEM	Review and revise motion on intervention and injunction. Prepare dec of Moewes and file. Exchange emails with Bernstein. Continue work on response to motion to declare debtor a stockbroker, Moewes declaration and Bernstein declaration. Review 341 transcript. numerous revisions and file.	8.80	2,992.09 <i>S</i>
2/13/2012	DEM	Review revised stipulation from Nate Riordan, revise order, email to Nate re: one more revisions. (Kerita Lisa AP)	0.30	102.0 ATM
2/14/2012	DEM	Review numerous claims filed by debtor on behalf of others, compare with Zieve claim, discuss with Wood all relating to stockbroker motion. (1.4). Revise Kerith Lisa stip and order, exchange emails with Nate and file (.3)	1.70	578.00CFD
2/15/2012	TMK	Review recorded documents of Shasta and Tehama County in regard to notice of default; create record of findings; call Shasta County and request a copy of the notice of default filed on January 25, 2012. Review of claims filed on 2/14; memo to DEM regarding same.	2.30	287.50 MonT
	DEM	Review reply to Response on stockbroker motion. Review various documents paralegal pulled in relation to Montcrest. Begin preparation of sur-Reply exhibits dec of Moewes. Legal research on Rule 11 and fraud on the court. Revise all documents and file. Call from Wells.	6.60	2,244.00056
2/17/2012	EJW	To Court to argue motions for intervention, injunction and declaration of stockholder status.	2.00	720.00DMI
2/21/2012	DEM	Discussion with Wood re: results of hearing from Friday. Prepare order denying motion to intervene and motion for order that proceeding is stockbroker bankruptcy. Email to Kim Kelly re: new date for 105 conference. Exchange emails with Martin, hearing results. Revise order on intervention and email to Attorney Wells.	1.60	544,00 DMT
2/22/2012	DEM	Exchange emails with Kim Kelly regarding dates for section 105 conference. Revise order and email to Wells and McCullough. File signed order denying motion to intervene.	0.30	102.00 105

			Hours	Amount
2/22/2012	DEM	Revise stockbroker order. Exchange emails with Jarvis and file. Email to Brown re: request for Form II.	0.40	136.0068
	DEM	Conference call with Karma and Steven regarding potential settlement with Jill Borodin of Montcrest issue. Discuss with Wood.	0.90	306.00 Harr
2/23/2012	EJW	Review and revise response to motion of Tsai firm for payment of fees.	0.20	72.00 BAI
	DEM	Review second motion for compensation filed by Tsai and prepare response thereto. Prepare declaration of Brown and forward to him.	2.60	884.00 TSN
2/24/2012	DEM	Finalize response to Tsai motion, review Brown revisions to declaration, file. Read response from Tsai. Confirm hearing.	0.70	238.005A
2/28/2012	DEM	Prepare reply to response to motion to compel turnover. Revise and finalize.	1.10	374.00TSA(
	For pr	rofessional services rendered	50.50	\$16,729.50
	Additi	onal Charges :		
2/2/2012 2/29/2012	Gross	Legal Services sman/Montcrest Westlaw Electronic Research - February sman Westlaw Electronic Research - February sman Stockbroker: Westlaw Electronic Research - February		25.00 138.41 452.11 94.38
	Total	additional charges		\$709.90
	Total	amount of this bill	-	\$17,439.40
	Previo	ous balance	5	\$77,962.34
	Balan	ce due		\$95,401.74

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

March 31, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

71624

		_	Hours	Amount
3/2/2012	DEM	Prepare for and attend hearing on motion to compel disgorgement.	0.80	272.00TSA 1
3/6/2012	DEM	Phone call with Ed Fish regarding recording judgments. Email to Ed Fish.	0.30	102.00 MISC
3/8/2012	DEM	Amend Complaint to include 773 Metro Way Family Trust as a defendant. (.8) Phone calls with Wells. (.3) Exchange emails with Ron regarding email from Adam (.2)	1.30	442.00KAP
	DEM	Review and revise motion for default, order judgment and findings of fact and conclusions of law against Abraham Wyner	0.70	238.00ATM
3/19/2012	DEM	Final review and revision to default against Wyner, order, Findings of fact, prepare dec of Moewes, finalize and file.	1.10	374.00 ATM
3/20/2012	DEM	Exchange emails with Reily regarding reimposing the stay.	0.10	34.00 MISC
3/22/2012	DEM	To Court for section 105 conference.	1.00	340.00 Misc
3/23/2012	DEM	Revise LeBlanc motion for default, revise order and begin preparation of findings of fact and conclusions of law.	0.70	238.00 ATM
3/26/2012	DEM	Finalize motion, order, Findings of fact conclusions of law and declaration of Moewes against LeBlank and file.	0.80	272.00 ATM
3/28/2012	DEM	Phone call with Brown re: settlement offer on Montcrest. Phone call with Zieke. Begin preparation of motion to approve compromise of issues relating to 868 Montcrest Drive.	2.10	714.00 Mont
	For pr	ofessional services rendered	8.90	\$3,026.00

DOLL	00011111		
KON	BROWN,	TRUS	FF

GROSSMAN, ADAM 92369

Page

2

Additional	Charges	
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		Amount
2/16/2012	Recording Fees for Miller /Glennview/Keywest, Opie, Keywest Financial with Tehama County Recorder and Strauss/Keywest, K Lisa, Reynolds and Keywest Financial with Shasta County Recorder.	223.00
	Total additional charges	\$223.00
	Total amount of this bill	\$3,249.00
	Previous balance	\$95,401.74
	Balance due	\$98,650.74

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

April 30, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

71715

				Hours	Amount
4	/4/2012	DEM	Continue preparation of motion to approve compromise and settlement regarding issues relating to Montcrest. Revise and email to Karma and Reilly.	1.30	442.00Mont
		DEM	Email from realtor. Email to Jarvis regarding selling Strauss to Grossman.	0.30	102.00 59
4	/6/2012	DEM	Phone call to Ron Brown to discuss settlement, leave message. Second call to Ron, don't leave message. Exchange emails with Emily re: same.	0.20	68.00 56
4	/10/2012	DEM	Phone call with Trustee. Email to Emily regarding offer on Strauss.	0.20	68.0056
4	/12/2012	DEM	Review counter to our offer. Exchange emails with Brown. Email to our real estate agent; need him to go to all houses and find out who is living in them, rental terms and who is collecting the rent (.4). Phone call with Zeike and Reillly regarding motion on Montcrest. (4)	0.80	272.0056
4	/16/2012	DEM	Review answer to Montcrest complaint.	0.30	102.00 MINT
4	/17/2012	DEM	Email from Aspaas re: will be filing RFS. Email to Jeff and Emily re:same.	0.20	68.00ATS
4	/27/2012	DEM	Review motion to abandon. Email to Karma. Phone call with Karma.	0.50	170.00 DMA
4	/30/2012	EJW	Review and revise notice and motion to approve settlement with Jill Borodin.	0.10	36.00 S
		DEM	Review and revise motion to approve compromise and settlement re: Montcrest. Exchange numerous emails with Rob, real estate agent in California. Prepare order. Email to Karma for final approval.(1.3). Phone call with Jeffrey Bernstein re: alleged actions relating to Terrington Davies.(.4). Finalize default motion, order and declaration of Moewes relating to Montcrest9	2.60	884.00 Mont

		Hours	Amount
	For professional services rendered	6.50	\$2,212.00
	Additional Charges:		
1/11/2012 4/2/2012	California Secretary of State UCC Services Federal Express		12.00 31.70
	Total additional charges		\$43.70
	Total amount of this bill	-	\$2,255.70
	Previous balance		\$98,650.74
	Accounts receivable transactions		
1/31/2012	Credit - Reverse 3 Recording Fees for Shasta County Recorder @ \$14.00 each billed in October 31. Rebilled the corrected amount in January @ \$22.00 each.		(\$42.00)
	Total payments and adjustments		(\$42.00)
	Balance due	\$	100,864.44

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

May 31, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

71855

Hours	Amount
2.00	680.00 DM PS
0.60	204.00 Mont
0.20	68.00 PMAS
1.80	612.00 KAP
5.00 1.3 ⁴ 442 3.7 1,258	1,700.00 Mont Mont
0.20	68.00 ATC
4.30	1,462.00 MonT
1	2.00 0.60 0.20 1.80 5.00 1.3 ⁴ 44Z 1.258 0.20

		-	Hours	Amount
		and Motion. Send declaration to Ron for his review. (1.8). Exchange emails with Ron and Karma regarding insurance. (.2)		
5/10/2012	DEM	Reread motion and declaration to compel abandonment several times, makes no sense. Exchange emails with Zeike and Reilly. Phone call with Reilly. Prepare response to motion for relief from stay on Strauss Lane Property and Declaration of Moewes. Begin response to motion for relief from stay on Metro Way Property. Email to Zeike re: need payoff for second DOT. Research bad conduct of debtor re: abandonment motion. Call with real estate attorney in California Steve Dean. Conference paralegal re: need hiring package. Review hiring package.	3.80	1,292.00 DHN
5/11/2012	DEM	Exchange numerous phone calls and Emails with Aspaas regarding relief from stays filed. Continue work on response to relief from stay. Research standing issue. Revise response several time. Finalize and file response to three motions, dec Middleton, dec Moewes.	5.40	1,836.00 ATM
5/15/2012	DEM	Respond to email from Trustee regarding insurance and other similar issues. Emails from accountant regarding basis. Email to Emily and Karma regarding basis.	0.90	306.00 MBC
5/16/2012	DEM	Review reply to objection to motion to compel abandonment. Exchange emails with Karma.	0.30	102.00 MAS
5/18/2012	DEM	Attend hearing on two motions for relief from stay and motion to compel abandonment.	4.10	1,394.00MAS
5/21/2012	DEM	Prepare order denying motion to abandon Strauss and Metro Way and email to Reilly and Wells (.4). Exchange emails with Rob Middleton regarding emails he has been getting from debtor (.3).	0.70	238.00 DHAS
5/22/2012	EJW	Review and revise default motion pleadings.	0.40	144.00 Mont
	DEM	Exchange emails with Rob Middleton and Steve Dean regarding Dean's employment and cost estimate to evict Miller and squatters at Strauss. Email to Middleton regarding starting short-sale discussions with Wells Fargo Bank.	0.30	102.005oc
	DEM	Prepare motion, default order, findings of fact and conclusions of law, and declaration of Moewes, and revise.	2.10	714.00 Scc
	DEM	Phone call with Shila Clemente regarding status of case (.1). Revise order denying abandonment motion and file (.2).	0.30	102.00DH \$5
5/24/2012	DEM	Metro Way. Revise findings of fact to delete portions relating to Irene Miller and footnote the avoidance of the Terrington Davies Capital Management transfer. Revise three times. Prepare exhibits to Moewes Declaration. Email motion, order of default and findings of fact conclusion of law to Jarvis.	1.70	578,00ATM

		to the second se	Hours	Amount
5/29/2012	DEM	Review Grossman response to motion to approve compromise and settlement. Review cases cited on exclusive jurisdiction and shepardize. Review docket to determine if same motion previously filed under different name. Prepare response and Declaration of Moewes. Call with Karma Zeike re; status of State Court appeal. Call with Steven Reilly. Finalize and file all documents.	5.20	1,768.00 Mont
5/30/2012	DEM	Exchange emails with Karma regarding call she got saying Adam was requesting continuance of briefing schedule in State court appeal.	0.10	34.00 MonT
5/31/2012	DEM	Review supplemental declaration of Zeike and file.	0.20	68.00 Mont
	For p	rofessional services rendered	39.60	\$13,472.00
	Additi	ional Charges :		
5/31/2012	West	law Electronic Research - May		170.35
	Total	additional charges		\$170.35
	Total	amount of this bill		\$13,642.35
	Previo	ous balance	\$	100,864.44
	Balan	nce due	\$	114,506,79

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

June 30, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

71883

			Hours	Amount
6/1/2012	DEM	Attend hearing on settlement of Montcrest. (2.5) Phone call with Karma Zaike re: results of hearing and information we need from her client (.4) Phone call with Trustee re: same (.2). Call with Steve Reilly re: same. (.2)	3.30	1,122.00 MonT
6/4/2012	DEM	Exchange emails with Emily. final revision to default papers re Metro way and file.	0.70	238.00ATM
6/5/2012	TMK	Revisions to pleadings to include real property description in order to effectuate transfer of title in California	0.50	62.50 AT M
	DEM	Begin preparation of supplemental response to motion to approve compromise and settlement. Review decree and map out net result from each property.	2.10	714.00 Man
6/6/2012	DEM	Exchange emails with Middleton. Conference call with Middleton and Brown. Conference call with Dean regarding evictions. Email to Dean of various pleadings	1.10	374.00Scc
6/7/2012	DEM	Call with Ron Brown. Email order of default and findings of fact and conclusions of law to Steven Dean. Conference with paralegal regarding recording of same.	0.30	102.005cc
	TMK	TFC with Trustee Brown regarding loan number for Wells Fargo on secured lien. Research documents on hand and claims; email to trustee with information	0.30	37.505
6/11/2012	DEM	Continue work on supplemental response. Prepare declaration for Ron Brown. Revise both documents and send to Ron for his review. Review ruling by Court of Appeals on Adams appeal of Decree of Dissolution.	2.20	748.00 MonT
6/13/2012	DEM	Phone call with attorney for Ms. Clement Email to Brown. Final review and revision to supplemental motion.	0.50	170.00 ManT

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			Hours	Amount
6/13/2012	DEM	Email from Ron relating to Strauus and Metro Way. Email to Jeff and Emily. Email to Karma. Email to Trustee.	0.30	102.005
6/20/2012	DEM	Review declaration from Wyner. Exchange emails with Wyner. Exchange emails with Reilly. (.5) Phone call with Steven Dean regarding evictions. (.3) Email to Trustee re: same. (.1)	0.90	306.00MonT
6/22/2012	DEM	Attend hearing on compromise. Calendar new dates and deadlines.	1.00	340.00 Mont
	For p	rofessional services rendered	13.20	\$4,316.00
	Additi	onal Charges :		
6/4/2012	US B	ankruptcy Court - Audio CD		30.00
	Total	additional charges		\$30.00
	Total	amount of this bill		\$4,346.00
	Previo	ous balance	\$	114,506.79
	Balan	nce due	\$	118,852.79
			gen	

RON BROWN, TRUSTEE

GROSSMAN, ADAM 92369

Page 3

Amount

\$131,323.86

Balance due

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

July 31, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

72027

	. 1010	555141 5511155		
		_	Hours	Amount
7/12/2012	TMK	Telephone conference with Ron at Redding Record regarding publication of summons to Evergreen. Telephone message for K. Kelley at Judge's Chambers requesting reissuance of summons for publication. Email to Ron at Redding Record with documents, asking for quote.	0.40	50.00MonT
	TMK	Review email concerning rents from 773 Metro Way property. Telephone conference with Walt Swift who was hired to manage property (by debtor). Email to Swift documents regarding bankruptcy estate, ownership of property, etc.	0.50	62.50 Som
	DEM	Prepare supplemental response in relation to claims. Prepare draft claims order if settlement is approved and if settlement not approved.	5.60	1,904.00CFD
	DEM	Discussion with Paralegal regarding notice to Evergreen and her discussion with Walt Swift. Exchange emails with Ron. Exchange emails with Rob.	0.70	238.00505
7/13/2012	EJW	Review and revise second supplemental statement re trustee's motion to approve settlement and tentative order allowing claims.	0.50	180.00 Mont
	DEM	Substantial revision to second supplemental response re: Montcrest and exhibit thereto, finalize and file and email to Karma.	4.20	1,428.00 MONT
7/19/2012	DEM	Review response. Review email from Emily regarding foreclosure 773 Metro, conference with paralegal re: need search of Shasta County records. Email Rob regarding same.	0.40	136.0050M
	TMK	Review records in Shasta County for notice of trustee sale; telephone conference with Assessors' office; telephone conference with Recorders' office.	0.50	62.5050M
7/20/2012	DEM	Phone call with Tess re: new response from Grossman, read response. Argument on settlement re: Montcrest. Conference with Wood regarding results of hearing. Revise order to deny settlement and file.	4.10	1,394.00 MONT

			Hours	Amount
7/20/2012	TMK	Prepare ex parte motion and order for turnover of funds held by property manager; file with court.	0.40	50.0050 M
7/23/2012	DEM	Email to Karma and Reilly, Call with Karma. Second round of emails.	0.30	102.00 MonT
7/24/2012	DEM	Lengthy conversation with Shelly Crocker regarding hearing last Friday and how to proceed.	0.40	136.00 Ment
7/25/2012	DEM	Begin preparation of objection to claim of Tanager Fund.	0.40	136.00CFD
7/27/2012	DEM	Investigate whether we should call a corporate meeting in Tanager Fund and Ptarmigan and appoint the trustee as managing member. Discuss proofs of claim with Wood. Begin preparation of objection.	6.20	2,108.00CFD
7/30/2012	DEM	Review two emails from Grossman and email from Brown of attachment Grossman sent to Trustee's accountant, Bruce Deveraux. Email from Wells and his secretary. Respond.	0.40	136.00 EMD
	DEM	Continue work on objections to all claims filed by Grossman. Prepare declaration of Moewes in support of objection to claim of Tanager and prepare exhibits, Dec of Moewes re: Ptarmigan and Dec of Moewes Dellas Family Trust, finalize and file. Email Dec in support of Dellas objection and objection to Dellas's counsel.	6.60	2,244.00 CFD
7/31/2012	TMK	Review bank records for preferences.	1.10	137.50 AAR
	TMK	Email from debtor regarding a number of items; response by email; Second email; response.	0.30	37.50 EMD
	DEM	Conference with paralegal re: Grossman's never ending emails. Tell her what limited portion to respond to. (.3). Phone call with Steve Dean's secretary. (.3)	0.60	204.00EMD
	DEM	Split up bank statements and begin avoidance action review with paralegal.	1.00	340.00 AAR
	For pr	rofessional services rendered	34.60 \$	11,086.00
	Additi	onal Charges		
6/1/2012 6/22/2012 7/20/2012 7/31/2012		ng		13.00 13.00 13.00 1,051.60 294.47
	Total	additional charges		\$1,385.07
	Total:	amount of this bill	-	12,471.07
	10.000	ous balance		
	TEVIC	de balance	31	18,852.79

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

August 31, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

72092

			Hours	Amount
8/3/2012	TMK	Telephone call with Jeff Bernstein regarding objection to claim; suggested he email DEM as he feels he has no claim and does not want to get pulled into the fray.	0.10	12.50CFD
8/8/2012	DEM	Numerous emails with Grossman's counsel. Forward offer to Brown. Review offer. Phone call from Wells.	0.50	170.00.56
8/9/2012	DEM	Brief review of settlement offer and forward to Brown.	0.10	34.0056
8/10/2012	TMK	Telephone conference with Mark Wilson (other counsel fro Grossman); he wanted to know if Denice has his offer from yesterday and if she'd sent it to the trustee. I advised she was out of the office until Monday, he then wanted to know if I would call her; I declined and advised that any offer presented could not be accepted immediately and that it had to be presented to the court for approval. He decided to email the trustee directly; I asked that he remembers to cc: DEM on his email nevertheless.	0.20	25.00 56
8/13/2012	DEM	. Email to Trustee asking him to call and discuss settlement offer. Exchange emails with Mark Wilson. Careful review of settlement offer. Prepare draft letter regarding problems with offer. Revise and email to Ron Brown requesting he call me. Email from Wilson, going to be sending revised offer. Review revised settlement offer. Exchange emails regarding same. Email to Ron Brown. Call to Ron Brown with request to call back.	1.20	408.00 56
	DEM	Email to Martin Smith re: need to review bank records he has prior to SOL date.	0.10	34.00 AA
8/14/2012	DEM	Call to Brown, leave message. Call to Brown, talk live regarding settlement offer of August 9 revised on August 13. Several revisions to letter rejecting settlement offer. Finalize and email to Mark Wilson.(.7). New settlement offer from Adam, which appears to almost the same as last. Review email back to Wilson, already rejected contingencies are still in new offer. (.2)	0.90	306.00 59

		-	Hours	Amount
8/15/2012	DEM	Exchange emails with Rob regarding evictions. Review ex parte motion to pay \$1,000 to dean for expenses of Strauss and Cottonwood foreclosure.	0.30	102.005
	DEM	To UST office with paralegal to review Grossman bank records for avoidance actions.	1.50	510.00ÅД
	TMK	To UST office to review bank statements with DEM.	1.00	125.00 AA
	TMK	Draft motion and order to pay eviction costs; file with court.	0.50	62.5050
8/17/2012	DEM	Final review of bank records, meet with paralegal, determine no avoidance actions.	1.00	340.00 AA
	DEM	Review and revise letter and subpoena to Redding utilities for records of tenant in our property.	0.20	68.00 505
	TMK	Prepare spreadsheet of preference action totals.	0.40	50.00 AA
8/20/2012	DEM	Email to Brown, Dean Middleton enclosing signed order authorizing payment of eviction expenses to Mr. Dean and update on subpoena to Redding utilities.	0.10	34.00505
8/21/2012	DEM	Phone call with Shila Clement. Revise declaration in support of objection to Delles claim and file. Revise second time and file. Preparation of declaration for Shila Clement. Email to Shila and her counsel along with revised declaration.	1.20	408.00/FD
8/22/2012	DEM	Exchange emails with Porter and Clement. Email from Adam's attorney with new offer; briefly review and send to Trustee.	0.20	68.00CFD
8/23/2012	DEM	Revise Declaration of Shila Clement.	0.20	68.00(FD
8/24/2012	DEM	Discuss latest offer with Grossman. Email to Grossman's counsel.	0.20	68.00 54
8/29/2012	DEM	Call from Adam Grossman wondering when I am going to correct "Fraudulent account". Told him I did not know what he was talking about. He said it was in emails. I said his email was blocked but would temporarily unblock.	0.10	34.00 EMD
	TMK	Draft motion for default; etc. Evergreen Regional Home Mortgage Services	1.40	175.00 MonT
8/30/2012	DEM	Review latest email from Grossman. Prepare response to emails from yesterday. Finalize and email to Grossman. Review latest letter from Grossman, respond to only one portion. Email with Ron.	1.20	408.00 EMD
	DEM	Exchange emails with Rob re: potential agreement with Wells Fargo for short sale. Email Ron re: same.	0.20	68.005a5

			Hours	Amount
8/	31/2012	DEM Review latest facsimile offer from Grossman. Exchange emails with Trustee on same (.3). Prepare declaration of no objection to objections to claims.(.5) Phone call with Steve Porter regarding call he received from Grossman and Wilson. Email him Grossman's declaration in State Court on how Montcrest was acquired and my declaration in support of objection to claim (.8)	1.60	544.00 FT
		For professional services rendered	14.40	\$4,122.00
		Additional Charges:		
8/	10/2012 15/2012 31/2012	US Bankruptcy Court - Audio CD Parking Faxes - August		30.00 8.00 7.50
		Total additional charges		\$45.50
		Total amount of this bill	_	\$4,167.50
		Previous balance	\$	131,323.86
		Balance due	\$	135,491.36
			_	

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

September 30, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

72179

	Prore	SSIONAL Services		
		_	Hours	Amount
9/4/2012	DEM	Preparation of Order Disallowing Claims, revise and file.	0.50	170.00°FD
9/5/2012	DEM	Read all 6 pleadings filed by Grossman. Call to Raimey. Revise order disallowing claims. Revise amended Declaration of No objection and file both. Exchange emails with Borodin's attorney	1.40	476.00CFD
9/6/2012	DEM	Amend FOF/COL in Evergreen Regional and file.	0.10	34.00 ManT
	DEM	Review my objection to claim 18 and 19 and Grossman's response.	0.30	102.00CFD
9/7/2012	DEM	Attend hearing on objection to claim #18 and 19. Phone call with Raimey regarding order referenced by Grossman in pleadings	2.90	986.00CFD
9/17/2012	DEM	Review and respond to numerous emails regarding debtor's request for interim report.	0.20	68.0rEMD
	DEM	Review offer and and counter from real estate agent on Metro Way and send back.	0.20	68.0050M
9/19/2012	DEM	Exchange emails with Nicole, Rob's assistant, regarding counter. Two additional emails. They have accepted counter of \$140k. Email to Jennifer Aspaas, represents first on Metro Way, regarding acceptance of offer. Email to Nicole: title may be a bear so should set up escrow and title immediately so we can start to work through any problems. Preparation of motion and order to approve sale of Metro Way Property, Declaration for Rob Middleton.	1.80	612.00504
9/24/2012	DEM	Phone call with Ron Brown. Revise motion to approve sale of Metro Way. Prepare declaration for Ron, Revise Middleton dec and email to him.	0.90	306.005oM
9/25/2012	DEM	Exchange emails with Reilly regarding Strauss notice of default, exchange emails with Rob regarding same, and download documents for him to give to bank (.4). Exchange emails with Steven Dean regarding answer to eviction complaint, read answer, download documents to	1.20	408.00 Sac

			Hours	Amount
		dispute allegations and email to Steven Dean (.5) Review two latest pleadings filed today by Grossman (.3)		
9/27/2012	DEM	Exchange several emails with Rob and Dean regarding Strauss Lane. Phone call with Trustee regarding his call from Jason White.	0.90	306.00565
9/28/2012	DEM	Exchange numerous emails regarding eviction hearing. Review flights. Call with Dean's office (.5). Review transcript and prepare order disallowing claim #'s 18 and 19.	1.20	408.0050C
	For pi	rofessional services rendered	11.60	\$3,944.00
	Previous balance		\$	135,491.36
	Balan	ce due	\$	139,435.36

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

October 31, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

72195

			Hours	Amount
10/5/2012	DEM	Call with Steven Dean's office regarding trial.	0.10	34.00 Soc
10/8/2012	DEM	Review docket in adversary proceeding. Email to Dean with various documents I think we may need as exhibits attached.	0.60	204.00 50
10/10/2012	DEM	To Redding, California to testify at eviction hearing and back.	16.60	5,644.00 SCC
10/12/2012	DEM	Review emails between UST and Brown and respond. Exchange emails with Adam. Review emails that Adam has been sending to Jennifer Aspaas.	1.00	340.00 EHD
10/15/2012	DEM	Call do Court to find out if Adam filed anything since he is not ECF filer. Prepare declaration of no objection and revise order and file.	0.40	136.00 So M
10/16/2012	DEM	Exchange emails with realtor. (.1) Review title report from title company for Metro Way (.2) Conference with paralegal re: need her to download orders avoiding the majority of the transfers listed and email to escrow agent (.2). Exchange emails with Adam regarding sale of Strauss and lack of offer on Strauss for more than is owed the consensual liens (.1)	0.60	204.00 Sory
10/17/2012	DEM	Review email forwarded by Courshon from Grossman and respond and attach transcript from hearing before Judge Barreca. Respond to three emails from Mr. Grossman. Review fourth email from Grossman.	0.70	238.00 EMD
10/18/2012	DEM	Call to judge's chambers to find out if order approving sale on Metro Way has been entered. Call to Danny Redmond. Review latest email from Grossman. Review new filing from Grossman (which appears to be same as earlier email. (.4).	0.40	136.00 504
	DEM	Exchange emails with Rob regarding eviction yesterday of Miller, listing agreement, etc. (Cottonwood).	0.20	68.00 Soc

RON BROWN, TRUSTEE GROSS	MAN, ADAM	92369
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RON BROWN, TRUSTEE		CUSTEE GROSSMAN, ADAM 92369		Page 2
			Hours	Amount
10/22/2012	2 DEM Exchange emails with Rob regarding title. Revise Lisa order, Wyner order and Metro way order to deal with email from Peters of FATIC. (1.0)			340.00 50 M
	DEM	Exchange emails with Rob regarding Strauss Lane and latest letter Wells Fargo. Forward to Jennifer Aspaas.	er from 0.30	102.00 565
	For p	rofessional services rendered	21.90	\$7,446.00
	Additi	onal Charges:		
10/10/2012	Airfar	e : Seattle to San Francisco e : Roundtrip San Francisco / Redding e : San Francisco to Seattle		394.93 850.00 461.80
	Total	additional charges		\$1,706.73
	Total	amount of this bill	-	\$9,152.73
	Previ	ous balance	-	\$139,435.36
	Balar	ice due	T.	\$148,588.09
			-	

303 NORTH 67TH STREET SEATTLE, WA 98103-5209

206-623-4382

Invoice submitted to:

November 30, 2012

RON BROWN, TRUSTEE 999 THIRD AVENUE STE 2525 SEATTLE, WA 98104-4032

In Reference To:

ADAM GROSSMAN BANKRUPTCY

CLIENT/MATTER: 92369

ATTORNEY: DENICE MOEWES

Invoice #

72305

			Hours	Amount
11/1/2012	DEM	Call with Brown re: documents he received from Adam he has not sent to me.	0.20	68.00 EMI)
11/6/2012	DEM	Review email from Rob on credits. Email to Ron. Email to Middleton. Review response from Middleton.	0.30	102.0550M
11/7/2012	EJW	Review and revise ex parte motion for amended order of sale.	0.10	36.00 SOM
	DEM	Exchange emails between Ron and Rob re: reduction of purchase price by \$2,500. Prepare motion for amended order with reduced purchase price. Prepare amended order and file.	0.70	238.0050M
11/8/2012	DEM	Review three emails from Mr. Grossman, briefly discuss with Mr. Wood. They don't appear to make any sense.	0.20	68.00 EYI)
11/12/2012	DEM	Exchange emails with Steven Reilly regarding a different settlement in relation to Montcrest.	0.20	68.00 Mont
11/13/2012	DEM	Review email from Mr. Grossman and respond.	0.20	68.00 EMD
11/14/2012	DEM	Review various non-sensical emails from Mr. Grossman. Forward to Ron Brown.	0.10	34.00EUD
11/15/2012	DEM	Exchange numerous emails regarding payoff, email from Aspaas re: PNC says they have foreclosed on Metro Way, Conference with paralegal regarding records in California. Conference with paralegal re calling Shasta County. Review records from Shasta County. Exchange emails with escrow for Metro Way. Exchange emails with Grossman.		816.00 Som
11/16/2012	DEM). Exchange emails with Reilly regarding new deal on Montcrest.	d 0.20	68.00 MonT

			Hours	Amount
11/19/2012	DEM	Exchange emails with Rob. Email to Ron re: need him to sign Cottonwood offer and send back so I can note up.	0.20	68.00 5
11/20/2012	DEM		3.10	1,054.00
		1) . To Crocker's office to meet with Reilly and Crocker regarding how to resolve Montcrest and get approval of any settlement (1.0)	1.0	340. MONT
44/04/0040	DEM			714. Admin
11/21/2012	DEM	conference with paralegal re: scouring documents for any reference to the PNC loan number. Email to closing.	0.20	68.00 50M
11/26/2012	DEM	Review email from Grossman. Email authorization to Trustee for his signature. Email Rob Middleton, need revised offer on Cottonwood so I can note for sale.	0.30	102.00 Say
11/27/2012	DEM	Preparation of motion to approve sale of Cottonwood property and order. Email to Middleton re: questions I need answered for his declaration. Prepare motion and order to shorten time, finalize and file.	1.30	442.00 SOC
11/28/2012	DEM	Review Cottonwood order and determine it needs to be amended to include legal and tax assessors number. Exchange emails with escrow re: same. Exchange emails with Middleton regarding declaration.	0.70	238.00 500
11/29/2012	DEM	Call with Brown. Call with Gayle at escrow. Obtain payoff and forward to Gayle. Several emails with Gayle about what we need to close Metro Way. Conference with paralegal re: certified copies needed for closing.	0.90	306.00SoM
	DEM	Cottonwood. Revise findings of fact and conclusions of law and judgment to include legal and tax assessor's number. revise and email to escrow for their review.	0.50	170.00 Soc
	DEM	Preparation of judgment Evergreen regional mortgage finalize and file.	0.40	136.00 Mont
	DEM	Exchange emails with Reilly. Review decree of dissolution and specifically who was assigned what debt, figure out what would happen if we split Montcrest with wife and used proceeds to only pay divorce creditors as Judge Barreca says they are the only ones not bound by the decree. Email to Reilly and Crocker with thoughts on this.	1.60	544.00 Mant
	DEM	Prepare declaration of Brown and Middleton in support of motion to approve sale of Cotonwood and email to them for their review.	0.60	204.00Soc
11/30/2012	DEM	Lengthy conversation with Wood regarding using community assets to pay only community claims. Review 541((a)(2) and 726(c)(2)(A).	0.60	204.00 MONT
	For p	rofessional services rendered	15.00	\$5,102.00

RON BROW	N, TRUSTEE	GROSSMAN, ADAM	92369	Page	3
	Additional Charges :				
				Amo	ount
11/30/2012	Westlaw Electronic Research -		149	9.20	
	Total additional charges			\$149	9.20
	Total amount of this bill			\$5,251	1.20
	Previous balance			\$148,588	8.09

Balance due

\$153,839.29